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Attorneys for the Federal Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Jacqueline Garcia,

Plaintiff,

v.

Eric S. Cohan, Stephanie Syptak-Ramnath,
Antony Blinken,

Defendants.

Case No: 2:23-cv-00849-CDS-MDC

**Unopposed Motion for Extension of
Time**

(Sixth Request)

The Federal Defendants respectfully move for an additional 30-day extension of time, from February 20, 2024, to March 21, 2024, to file a response to Plaintiff's Complaint (ECF No. 1). This is the sixth request for an extension of time. Undersigned defense counsel has inquired with Plaintiff's counsel, who agrees with this request. Indeed, Plaintiff's counsel would like additional time to continue consultation with the client, to determine potential preparation of documents that may be submitted to the agency, and to determine whether to proceed forward on the existing complaint.

MEMORANDUM OF POINTS AND AUTHORITIES

Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1 allow a party to request additional time to perform an act. In this case, the Federal Defendants request additional time to file a response to the Complaint for the reasons set forth below.

Without admission or waiver by the parties, the parties continue to assess recent

1 developments at the agency level, including the Department of State sending Plaintiff's
2 husband's visa application back to the United States Citizenship and Immigration Services.
3 Plaintiff and her counsel will continue to consult as to next steps.

4 This motion is filed in good faith and not for the purposes of undue delay.
5 Accordingly, Federal Defendants respectfully request, and Plaintiff's counsel consents to,
6 this extension of time, from February 20, 2024, to March 21, 2024, to file a response to
7 Plaintiff's Complaint.

8 Respectfully submitted this 20th day of February 2024.

9 JASON M. FRIERSON
10 United States Attorney

11 /s/ Patrick A. Rose
12 PATRICK A. ROSE
13 Assistant United States Attorney

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15 **IT IS SO ORDERED**

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19 **Maximiliano D. Couvillier III**
20 **UNITED STATES MAGISTRATE JUDGE**
21 **DATED: February 21, 2024**
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